

# **Frequently Asked Questions about the Permitting Information Data Standard**

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The questions and answers are arranged in four categories:

- General
- Implementation of the Data Standard
- Use of the Data Standard
- Technical Questions for Implementers

## **General Questions:**

### **Q1: What is the Permitting Data Standard?**

**A:** A "data standard" is a documented agreement among organizations that share or exchange data regarding representation, formats, and definitions for such data. The Permitting Data Standard provides a common vocabulary to be used by EPA, States, Tribes, and local government agencies that want to share data about environmental permitting activities. The Data Standard is made up of a list of data elements, each of which is defined. Relationships or linkages among data elements (both within the Permitting Data Standard and between it and other data standards) are also identified.

### **Q2: Why was the Permitting Data Standard revised?**

**A:** The Permitting Data Standard was revised to broaden the scope of the standard, to better address the full life cycle of the permitting process, and to more comprehensively represent the complexity of multimedia permitting programs. The initial Permit Data Standard Action Team in 2001 decided to develop a simple, high-level standard that includes core data - information sufficient to identify a permit, as well as some information on administrative status and history - that is common across most organizations and programs. While programs may have the need to exchange more program-specific information relating to permits, the EDSC decided that the original standard should be expanded prior to developing program-specific standards to avoid duplicating similar information.

### **Q3: What changes were made to the Permitting Data Standard?**

**A:** Minor changes were made to the definition and relationship portions of the standard, and additional data elements and definitions were added to the standard to better characterize facility/feature characteristics, permit conditions, and control methodology information. A number of contact related data elements that were originally part of the Permitting Data Standard have been removed because they are contained in the Contact Data Standard that was subsequently approved. In addition, the permitting II Action Team identified a distinction between permits, licenses, and certifications and believes that permits and licenses are sufficiently similar to be considered together where as certifications do not. This clarification is captured in the revised definition of "permit" which appears in Q10.

### **Q4: The standard refers to "relationships" with other standards, such as the Facility Identifier and Chemical ID standards. Does this mean that these other standards are included in the Permitting Standard? How would this work in practice?**

**A:** Because environmental business areas are interrelated (e.g. facilities have permits, agencies take enforcement actions against organizations that own facilities and have permits...), the standards for these areas are also interrelated. For example, core information that is part of a permit includes facility information (defined in the Facility Identification standard) and information about chemical and biological parameters (defined in the Chemical Identification and Biological Taxonomy standards). Rather than reinvent or duplicate these existing standards, the Action Team has identified some of these relationships and refers to other standards for reference.

The way in which such a relationship would be applied is best understood in the context of a "transaction" or exchange of data. Simple incorporation of existing standards, such as the Data Standard, is straightforward; one simply uses the prescribed format for the data element in the exchange of data. In more complex cases, it may be necessary to link two or more distinct records (e.g., Permit information and Facility information), each covered by its own standard.

For example, in transmitting a set of permit records from one organization to another using common means of electronic file transfer (e.g., spreadsheet or fixed format file), it would be necessary to include information in each *permit* record that uniquely identified the *facility* to which the permit is issued (this might include EPA Facility Registry ID, State Facility ID, or other information). Additional facility information could be sent in an accompanying facility file, consistent with the Facility ID standard. If the recipient already possessed the facility file or had ready access to that information, the unique facility identification information would be sufficient. Information about chemical or biological parameters regulated under a permit would be handled in analogous fashion.

**Q5: Who developed the Permitting Data Standard—is this another federal mandate?**

A: No, this is not another federal mandate. The decision to develop Data Standards, including the Permitting Data Standard, was made jointly by EPA and the States (through The Environmental Council of the States (ECOS), an organization that represents the heads of the state environmental agencies). All recognized that sharing and exchanging accurate data is important and will remain so. All recognized that the public increasingly expects and deserves to have access to compilations of current data about environmental permitting activities. Together, they established the Environmental Data Standards Council (EDSC) to manage and guide the process. Action Teams are established to develop data standards as needed, and these teams are made of representatives from EPA and the States and are co-chaired by an EPA and a State official.

**Q6: Why do we need standardized permitting data elements?**

A: There are many different environmental programs, and many different government agencies involved in environmental permitting. Often, these different programs or different permitting agencies use different names to describe components of a permit. In other instances, activities or instruments with the same or similar names are functionally quite different. For example, different state agencies may use terms such as wastewater discharge permit, SPDES permit or NPDES permit to refer to similar things – permits issued under the NPDES provisions of the Federal Clean Water Act (and equivalent state enabling legislation) to facilities discharging to waters of the United States.

If data from different programs and different agencies are to be shared, it is important that we identify uniformity, regardless of what they are called or named by the source of the data. In other words, we need to make sure that apples are compared to apples, even if we know that some are "Golden Delicious" and some are "Granny Smith."

## **Implementation of the Data Standard:**

**Q7: Will my agency (or my program) be required to use the Permitting Data Standard?**

A: No State, Tribal or local government agency or program is required to adopt or use the Permitting Data Standard, nor to incorporate it into that agency's or program's own data systems. However, once EPA and state agencies adopt and begin implementing the Data Standard, it will likely become the specified "road map" for communications among environmental agencies exchanging environmental permit information.

**Q8: When is the Permitting Data Standard anticipated to be approved by ECOS and EPA?**

A: The Permitting Data Standard was approved by the EDSC in December 2001 and by the EPA in April

2002. It is anticipated that review of that the revisions to the Permitting Data Standard will be completed in June 2003, and be approved in July 2003 by the EDSC.

**Q9: My information system already conforms to the current Permitting Data Standard. What will I have to change to conform to the revised Permitting Data Standard?**

A: Data elements contained in the Permitting Information Data Standard that were in the previous Permitting Data Standard are unchanged. Some data elements that were in the previous Permitting Data Standard have been removed because they are captured under another data standard (the Contact Data Standard) that was developed and approved since the passage of the first Permitting Data Standard. The types of data elements that have been removed represent various elements used to identify organizations, and points of contact that are not unique to permitting, but that can be used generally with the flexibility of applying to specific organization or points of contact based on the relationship or affiliation indicated. In cases where your information system includes these data, you may need to map to the terms of the data elements of the Contact Data Standard, but the values should be equivalent. New data elements contained in the revised Permitting Data Standard will also need to be considered where this information exists in your information system.

**Q10: My agency regulates a number of facilities and other entities that have licenses or authorizations, but not permits per se. Are they covered by this standard?**

A: The Standard defines "permit" as an authorization, license, or control document used to implement the requirements of a regulation. This definition encompasses instruments not specifically called permits, but does not encompass all facilities, individuals, or entities that are regulated or are of interest to environmental management agencies. For example, the current definition would not include TRI facilities or RCRA generators which must comply with regulations but which don't operate under an entity-specific permit or authorization. The EDSC invites comments on how well this standard would work for exchanging information about this broader set of regulated entities.

**Q11: Can some programs within a State, Tribe or local government follow the Permitting Data Standard, while others do not?**

A: Use of the Permitting Data Standard is not required, although over time it may become the standard for sharing or exchanging data with EPA national data systems through the Exchange Network, as well as between state agencies. See Question 19 for additional information on the Exchange Network. State, tribal or local government programs—especially those that do not exchange data with EPA, other Federal agencies or agencies in other states—are certainly not obliged to adopt or work within the Permitting Data Standard. However, as it becomes a widely accepted standard, they may find it useful to use it in data management and exchange.

**Q12: I am from a State, Tribal or local government agency. My program doesn't use the same data elements that are used in the Permitting Data Standard. Is there an expectation that we will change our data elements?**

A: No. The Data Standard uses terminology intended for data *exchange* and is applicable only when the data that is sent crosses the threshold of your organization. Similar data that are exchanged will need to map to existing data holdings or conform in definition, meaning, and format to the Standard.

**Q13: My EPA program doesn't use the same terms as are used in the Permitting Data Standard. Is there an expectation that we will change our terminology to match the standard?**

A: Although the Data Standard is intended for use in data exchange, it is expected that EPA programs will, as necessary (and over time), modify the data elements that they currently collect to conform to the data elements and terms in the Permitting Data Standard. The schedule for these changes will be addressed in the Business Rules that provide implementation guidelines specific to the Agency.

**Q14: Is the Permitting Data Standard the basis for a new data system design? Will we have to change our existing data system to conform to it?**

A: The answer for State, tribal, and local government agencies is No. The Permitting Data Standard is more like a dictionary to help translate or exchange data from any one data system to any other. Use of the Permitting Data Standard does not require that any non-EPA agency or program change its current data system. Nor does it require that existing non-EPA data systems change their current nomenclature for permitting or similar activities (e.g., licenses or authorizations). When data are exchanged from one system to another, the Permitting Data Standard will provide the necessary information to insure that data from a given field in the sending system is "mapped" to the correct location in the receiving system. Local system designers may, once they choose to use this Data Standard for data exchange, elect to modify their system (perhaps in the context of a previously planned system modernization) to create the capability of exchanging data that conforms to the standard. As noted in the response to Question 13, above, EPA will be using the Data Standard as its own data systems are modified and updated.

**Q15: We are planning to update (one or more of) our current permitting data system(s). Can the Permitting Data Standard help us in this effort?**

A: Yes. If an environmental program or agency is planning to update its existing data system(s), the Permitting Standard can provide a useful, peer-reviewed template for the kinds of data that current good practice suggests might be exchanged.

**Q16: Are there any federal funds available to help States, Tribes, or local government agencies that implement federal programs if they choose to update their systems to enable them to communicate more easily using the Permitting Data Standard?**

A: Yes, although such funding is not linked directly to the Permitting Standard development effort. EPA has and will continue to provide grant funding to assist other levels of government that implement federal environmental programs. Such assistance has often been used by grantees to help develop and update data management systems.

**Q17: There are a number of data elements listed in the Permitting Data Standard that we don't currently record or track in our own data system. Will we now be required to do so?**

A: No. The presence of a given data element in the Permitting Data Standard does not create a new data collection requirement. State, Tribal, and local government systems do not need to begin collecting all data for which there are data elements in the Data Standard.

**Q18: I currently provide a large amount of permitting data to EPA from my State (or Tribal or local governmental) agency. What does the Permitting Data Standard mean for that exchange?**

A: In the short term, probably very little. However, as States and EPA modernize their systems and work towards improved and integrated data exchange tools (see "Network" Question, below) this Data Standard will be used as the basis for new data exchanges. State and EPA data flows are governed by a complex set of mandates and agreements that this Data Standard will not change. Instead, this Data Standard is intended to serve as a tool to better facilitate State and EPA data flows. As EPA implements this Data Standard it will influence the data EPA seeks from States and the way in which those data are to be transmitted.

**Q19: What does this standard have to do with the Exchange Network? I thought everything was supposed to be in XML. Is this XML?**

A: The Network concept relies upon common "Data Exchange Templates" (DETs) expressed in "XML," and exchanged based on common protocols. This Data Standard would be used as the starting point or "core" contents for DETs that contain permit information. Once established and approved, these flows would replace existing feeds to EPA's national data systems. For example, several states have used a DET based on the State/EPA Facility Identification Standard to exchange facility data with EPA and other States, using Network protocols. The XML expression of this Data Standard is under development and will be available shortly. From that point forward, a new DET for Permit would be based on this Data Standard.

**Q20: If the data elements in the Permitting Data Standard don't fit my program, but I have to use it**

**when exchanging data, won't that simply increase confusion?**

- A: We believe this is very unlikely. As noted earlier, the Action Team that developed the Standard included members from a variety of State and EPA programs, thus providing to the process a widely and varied experience with a considerable depth of expertise. This draft is undergoing peer review by other programmatic experts at both the Federal and State levels, and the team is prepared to make further revisions if needed to ensure that this standard is useful and provides the benefits for changing information.

## **Use of the Data Standard:**

**Q21: Who will use the Permitting Data Standard?**

- A: All Federal, State, Tribal and local government agencies involved in issuing or managing environmental permits or authorizations, or who manage permitting data, are encouraged to use the Permitting Data Standard when and if they share or exchange data with other agencies. They are also encouraged to refer to the Permitting Data Standard and use it as a tool, if they are planning to update or enhance their own existing data systems. The public will be the ultimate user of the Data Standard because it will promote consistency in the data in which they are interested and that they request through data queries, etc.

**Q22: Will EPA be issuing rules for use of the Permitting Data Standard?**

- A: No, at least not in the sense of issuing formal regulations. Information on the standard will be available through the EDSC website and the Environmental Data Registry (EDR).

**Q23: Will the Permitting Data Standard be open for revision in the future? How will the Standard be maintained?**

- A: Yes. There is every reason to expect that future adjustments or revisions will be necessary. The need for revisions may arise in at least two areas: (1) Environmental programs evolve, and new programs may be added. This will necessitate, at a minimum, revisions and additions to the lists of Permissible Values associated with certain data elements. (2) Once in use, we may discover flaws in the Data Standard that need to be corrected (e.g., linkages and relationships that need to be adjusted; additional levels of detail that should be provided, etc.) EPA and ECOS expect to maintain an ongoing institutional mechanism to make needed future revisions.

## **Technical Questions for Implementers:**

**Q24: Why isn't the Permit Number/Identifier sufficient to identify a permit uniquely? Why does this matter?**

- A: Unique identification of a permit is important because it allows one permit to be positively identified and distinguished from all others (even those that may have similar names, etc.) One of the objectives of this Permitting Data Standard is to provide a means of uniquely identifying permits across agencies, programs and levels of government, so that information can be exchanged without confusion. Permit identifiers issued by permitting agencies are typically unique within a program, but not necessarily within an agency. There is typically no assurance that one state's identifying numbers are different from another's. For this reason, the EPA Business Rules, which represent a specific Agency implementation of the Standard, specify a combination of data elements (Permit Number/Identifier, Name of Issuing Organization and Permit Type) that will provide unique identification of a permit.

**Q25: Do all permits have "permitted features?"**

- A: The permitted feature group of data elements includes information about a permitted feature of a permit. Most permitted entities will have at least one "permitted feature," such as a stack, storage unit, or outfall. The standard also allows for multiple permitted features for more complex facilities. In some cases, a facility (or other permitted entity) may have no specific permitted features but nevertheless be

subject to general requirements such as reporting, personnel training, or facility-wide best management practices. In such a case, the standard allows the flexibility not to specify any permitted features.

**Q26: Do we need to use the Permissible Values from the Data Standard?**

A: Permissible Values characterize the exact names, codes, and text that can be used in exchanging information. Where the standard specifies permissible values (e.g., Permit Type includes permissible values such as Air – Title V and RCRA – Part A), agencies using the standard should use the specified value to describe a permit record if it is appropriate—even if the agency in question uses a different term (such as Major Air Operating Permit or Hazardous Waste Interim Permit). By taking the effort to use these standard designations, agencies make the fullest use of the standard and assure more accurate data exchange and interpretation.

**Q27: What if I wish to exchange information that isn't covered by the listed Permissible Values? Does this mean I can't use the standard?**

A: No. The Action Team believes that the Permitting Data Standard will be appropriate for exchanging information about a broad range of permits, licenses and authorizations at the Federal, State, Tribal and local levels of government. The Team developed proposed Permissible Values for widely used major permit types authorized under Federal environmental laws. The Team anticipates that users exchanging information about permit types beyond those listed will work out additional permissible values in the context of individual data exchanges among specific data exchange partners. The Team is interested in comments on the workability of such a "partially managed" set of permissible values. The Team also invites comment on whether it would be desirable to develop more extensive lists of permissible values (for example, covering permit types such as solid waste landfill permits common to many state, tribal and/or local environmental agencies).

**Q28: Do data elements in our application systems need to be the same data type as the Standard Data Element? What if our Data Element field lengths are longer or shorter than the standard?**

A: This Standard only specifies how information will be exchanged, not how systems should be designed. At times, differences between system parameters and Data Standard specifications may require some translation from a system that uses field lengths, etc. Field lengths in the standard are intended to accommodate the expected maximum length of the values across partner systems based on analysis conducted to date. If a system has a longer value for a given element and the organization wishes to exchange data using the standard, the value exported from the system would have to be adjusted (e.g. truncated or abbreviated). Field lengths in the standard can be increased if partner needs require this, through the maintenance review of the standard.

**Q29: Does the draft standard allow the tracking of off-site waste disposal that may be generated by a permitted entity?**

A: Yes. The draft standard provides for this by first identifying the substance (e.g., sludge) or other material by using the *Facility/Feature Characteristic Name*. How the permitted facility manages that material (e.g., land application) can be indicated by using *Methodology Type*. Capturing the off-site location of the land application can be done by using *Methodology Description*, which is sufficiently flexible with a complementary format that is large enough to allow location descriptions. However, the *Latitude/Longitude Data Standard* should be used for defining point locations, and the *Facility Identification Data Standard* should be used if applicable.